

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI**

**STACY ARNOLD,** )  
                        )  
                        )  
**Plaintiff,**       )  
                        )  
                        )  
v.                     )  
                        )  
**CITY OF ST. JOSEPH, ET AL.,** )  
                        )  
                        )  
**Defendants.**      )

**Case No. 19-CV-06137-BP**

**DEFENDANT ST. JOSEPH PUBLIC LIBRARY'S UNOPPOSED MOTION FOR  
EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S INTERROGATORIES AND  
FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS**

**COMES NOW** Defendant St. Joseph Public Library (“Defendant”) by and through its attorneys of record and moves this Court for an extension of time to respond to Plaintiff’s First Interrogatories and First Requests for Production of Documents. Defendant states the following in support of this Motion:

1. Plaintiff served her First Interrogatories and First Requests for Production of Documents on or about April 30, 2020 (ECF No. 60).
2. Defendant’s responses to Plaintiff’s First Interrogatories and First Requests for Production of Documents were originally due June 1, 2020.
3. Defendant requests an additional fourteen (14) days, or until June 15, 2020, to respond to Plaintiff’s First Interrogatories and First Requests for Production of Documents. This request is made due to the recent orders to shut down various facilities including Defendant Library which have caused significant disruptions to the business operations of Defendant.
4. Counsel for Defendant has conferred with Plaintiff regarding this requested extension and Plaintiff has no objection to this requested extension.

5. No prior extensions of time have been requested to this deadline.
6. Defendant is constrained to make this request out of necessity and not for the purpose of causing any unnecessary delay.

WHEREFORE, Defendant St. Joseph Public Library requests that this Court grant it an additional fourteen (14) days up to and including the 15<sup>th</sup> day of June, 2020 within which to provide its responses to Plaintiff's First Interrogatories and First Requests for Production of Documents.

Respectfully submitted,

McANANY, VAN CLEAVE & PHILLIPS, P.A.  
10 E. Cambridge Circle Drive, 300  
Kansas City, Kansas 66103  
Telephone: (913) 371-3838  
Facsimile: (913) 371-4722  
E-mail:[ggoheen@mvplaw.com](mailto:ggoheen@mvplaw.com)

By: /s/ Gregory P. Goheen \_\_\_\_\_  
Gregory P. Goheen #58119

Attorneys for Defendant St. Joseph Public Library

**CERTIFICATE OF SERVICE**

I hereby certify that on the 1<sup>st</sup> day of June, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which sent notification of such filing to the following:

Stacy Arnold  
500 Westover Drive #11589  
Sanford, NC 27330  
Plaintiff, *pro se*

Mark Beam-Ward  
Beam-Ward, Kruse, Wilson & Fletes, LLC  
8645 College Boulevard, Suite 250  
Overland Park, KS 66210  
Attorneys for Defendant Roger Clary

/s/ Gregory P. Goheen \_\_\_\_\_